



EQUALITY & DIVERSITY POLICY

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EQUALITY & DIVERSITY POLICY

1. Introduction to the Policy

This Equality and Diversity Policy sets out the framework, principles, and procedures that **Byram House** follows to promote equality, embrace diversity, eliminate unlawful discrimination, and foster an inclusive culture for all staff, children, young people, and anyone engaging with the home. The policy applies to all staff members, job applicants, agency workers, contractors, volunteers, and bank workers working with Byram House (whether at 62 Deighton Road, 66 Deighton Road, or elsewhere). It also applies to the treatment of children and young people in our care, their families, and visitors to the home. Byram House recognises the value of a diverse workforce and the importance of treating every individual with dignity, respect, and fairness. We are committed to providing equal opportunities within the workforce, eliminating unlawful discrimination, and promoting an environment where differences are celebrated and valued, not merely tolerated.

The Home is Byram House, which comprises the two residences at 62 Deighton Road and 66 Deighton Road. This policy applies equally across both residences. Byram House employees **must** ensure that:

- All individuals are treated fairly, with dignity and respect, regardless of their protected characteristics or any other factor that sets one individual apart from another.
- They understand and respect the diverse needs of the people they work with.
- They pay close attention to equality and diversity in all aspects of their work.
- They actively promote equality and diversity in their practice.
- They address inappropriate behaviour and report any discrimination, harassment, or victimisation to their manager.
- They are fully aware of, and apply, this policy and all related equality and diversity guidelines.

Byram House is committed to promoting anti-discriminatory practice — an approach to working with individuals that promotes diversity, self-esteem, positive group identity, and the fulfilment of individual potential.

2. How this Policy Benefits the Home

This Equality and Diversity Policy benefits Byram House in the following ways:

- **Legal Compliance** – It ensures the home meets all current statutory requirements, including the Equality Act 2010 (as subsequently amended), the updated **Social Care Common Inspection Framework (SCCIF) 2026, Working Together to Safeguard Children 2026**, and the **Employment Rights Act 2025** (which amends the Equality Act 2010 with a new duty to prevent sexual harassment in the workplace effective October 2026).
- **Clarity for Staff** – It provides clear definitions of discrimination types (direct, indirect, by perception, by association), harassment, victimisation, and bullying, enabling staff to recognise and challenge inappropriate behaviour.
- **Child-Centred Safety** – It ensures that every child in our care is treated fairly and their individual needs are understood and respected, in line with the SCCIF 2026 focus on children’s lived experience and how well staff understand each child’s identity, communication, and what helps them feel safe.
- **Workforce Diversity** – It supports the recruitment, retention, and development of a diverse workforce reflective of the communities we serve, with safer recruitment practices designed to eliminate unconscious bias.
- **Anti-Discriminatory Practice** – It provides a framework for actively challenging racism, discrimination, and inequality, in line with the expectations of Working Together 2026 and the guidance for children’s homes.
- **Inspection Readiness** – The updated SCCIF 2026 requires inspectors to take appropriate action to comply with Ofsted’s Equality Act duties, including consideration of reasonable adjustments for individuals with protected characteristics. This policy demonstrates the home’s commitment to those duties.
- **Prevention of Harassment** – The policy addresses the new duty under the Employment Rights Act 2025 requiring employers to take “**all reasonable steps**” to prevent sexual harassment of employees, effective October 2026, with accompanying regulations specifying preventative steps including risk assessments and policies for reporting.

3. Definitions & Legislation

3.1 Definitions

Term	Definition
Home	Byram House, the children's home registered with Ofsted, which comprises two residences at 62 Deighton Road and 66 Deighton Road.
Company	IMS Care LTD, the registered provider and legal entity responsible for operating Byram House.
Byram House	The name used throughout this policy to refer to the home and its staff, as distinct from the company (IMS Care LTD).
62 Deighton Road / 66 Deighton Road	The two residences that form Byram House.
Staff	All employees, agency workers, volunteers, bank workers, and contractors working at Byram House (either residence).
Child / Young Person	Any person under the age of 18 who is accommodated at Byram House.
Protected Characteristics	The nine characteristics protected under the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (gender), and sexual orientation.
Diversity	Recognising, respecting and valuing people's differences to enable them to contribute and realise their full potential by promoting an inclusive culture for all staff and those in our care.

Equality	Ensuring individuals or groups are treated fairly and no less favourably, specific to their needs, with the aim of removing discrimination in all its forms.
Anti-Discriminatory Practice	An approach to working with individuals that promotes diversity, values difference, fosters self-esteem and positive group identity, and supports the fulfilment of individual potential.
Direct Discrimination	Treating an individual less favourably than another person because of a protected characteristic they have, are thought to have (perception), or because they associate with someone who has a protected characteristic (association).
Indirect Discrimination	Applying unjustifiable requirements or conditions that have a disproportionate impact on an individual or a particular group.
Harassment	Unwanted conduct relating to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
Victimisation	Treating a person less favourably because they have acted as a witness or informant in proceedings, or have participated (or not participated) in trade union activities.
Bullying	Persistent criticism, personal abuse, ridicule, ignoring, excluding, or other behaviour which humiliates and demeans an individual, gradually eroding their self-confidence and the performance of their duties.
Reasonable Adjustment	The duty under the Equality Act 2010 to make adjustments to remove or reduce disadvantages faced by disabled people when accessing services or employment.

3.2 Key Legislation and Statutory Guidance (presented in a table)

Legislation / Guidance	Key Provisions	Relevance to this Policy
Equality Act 2010	The principal legislation consolidating and strengthening previous anti-discrimination laws. Protects individuals from discrimination, harassment and victimisation on the basis of nine protected characteristics.	Forms the legal foundation for this policy. All staff must understand the protected characteristics and their duty not to discriminate.
Equality Act 2010 (Socio-Economic Duty) – Section 1	Requires specified public bodies to consider how their strategic decisions might help to reduce inequalities associated with socio-economic disadvantage. The UK government is now taking forward work to commence this duty in England, with statutory guidance expected.	Commencing in 2026, this duty will apply to public authorities commissioning services from homes like Byram House, requiring consideration of socio-economic disadvantage in placement and service decisions.
Employment Rights Act 2025	Amends the Equality Act 2010, introducing a new duty on employers to take “ all reasonable steps ” to prevent sexual harassment of employees. Effective October 2026. Regulations will specify steps including risk assessments, policies, and reporting procedures. Also introduces	Requires Byram House to implement proactive measures to prevent sexual harassment, including risk assessments and clear reporting pathways, before the October 2026 implementation date.

	powers for Fair Pay Agreements in the social care sector.	
Human Rights Act 1998	Incorporates the European Convention on Human Rights into UK law, including the right to respect for private and family life, and the prohibition of discrimination in the enjoyment of Convention rights.	Underpins the home's duty to respect the rights of all individuals and to ensure non-discriminatory treatment.
Children's Homes (England) Regulations 2015	Regulation 40 – notification of serious events. Regulation 44 – monthly independent person visits. Regulation 45 – annual review. Quality Standards for children's homes.	Requires the home to maintain a culture of equality and dignity. Inspections under Regulation 44 and 45 will scrutinise equality practices, including how the home meets the needs of children with protected characteristics.
Data Protection Act 2018 & UK GDPR	Sets out rules for processing personal data, including sensitive data relating to protected characteristics.	Governs how Byram House collects, stores, and shares equality monitoring data, ensuring compliance with data protection principles.
Working Together to Safeguard Children 2026	Published March 2026, replacing the 2023 edition. Includes a stronger focus on anti-racist, anti-discriminatory and culturally informed practice. Emphasises	Requires Byram House to actively challenge discrimination in all aspects of safeguarding practice, including understanding how

	understanding and challenging racism and inequality within safeguarding assessments and decision-making.	discrimination affects children's experiences.
Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026	Effective from 1 April 2026. Focuses on children's lived experience, how well staff understand each child's identity and communication, and the quality of relationships. Clarifies that inspectors will take appropriate action to comply with Ofsted's Equality Act duties, including reasonable adjustments for individuals.	Inspectors will evaluate how well the home meets the needs of all children, including those with protected characteristics, and whether reasonable adjustments are made for disability.
EHRC Code of Practice for Services, Public Functions and Associations (amended draft, awaiting Parliamentary approval)	Provides practical guidance on how service providers and those exercising public functions should interpret the Equality Act 2010. Amended to reflect the Supreme Court ruling on the definition of sex (April 2025). Currently awaiting Secretary of State approval and Parliamentary laying.	Once approved, this Code will have legal status and will guide Byram House on providing services to individuals with protected characteristics, including in relation to single-sex spaces and gender reassignment.
Supreme Court Ruling (April 2025) – For Women Scotland Ltd v The Scottish Ministers	Ruled that the definition of "sex" in the Equality Act 2010 should be interpreted as biological sex only – i.e., sex recorded at birth. Holding a Gender Recognition	Impacts how the home interprets provisions relating to "sex" under the Act, including in the context of safeguarding and accommodation.

	Certificate does not change a person's legal sex for Equality Act purposes.	Staff should be aware of the ruling and its implications for service provision.
Workforce Race Equality Standard (WRES) and related programmes	Supported by programmes such as the ARWAP (Anti-Racist Wales Action Plan) 2025-2026, which focuses on the experiences of social care staff from ethnic minority backgrounds, examining recruitment, career development, and progression.	Reflects the expectation that social care providers actively address race inequality in their workforce. Byram House will monitor recruitment, progression, and retention data to identify and address disparities.

4. The Policy

4.1 Policy Statement

Byram House promotes practices that are fair and free from unlawful discrimination. Everyone is different, with different views, hopes, and aspirations. We recognise, respect, and value those differences to enable all individuals — children, staff, and others — to contribute and realise their full potential.

This policy applies to all job applicants, contractors, agency workers, bank workers, and all staff members who have a contract of employment with Byram House. It also applies to the treatment of children and young people in our care, and to visitors to the home.

No employee, job applicant, child in our care, or provider of goods and services will be treated less favourably based on:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion or belief
- Sex (gender)
- Sexual orientation
- Or any other factor that sets one individual apart from another

Byram House will avoid unlawful discrimination in **all** aspects of employment, including recruitment, promotion, opportunities for training, pay and benefits, discipline, working conditions, terms of employment, and selection for redundancy. This commitment extends equally to the care and treatment of children in our placement.

We have implemented a Flexible Working Policy, with provision for maternity leave, parental leave, paternity leave, and adoption leave. Employees who have suffered unlawful discrimination or treatment will have their concerns taken seriously and will be offered guidance and support.

4.2 Responsibilities

All employees have the responsibility to ensure their actions are in accordance with this policy and are expected to:

- Understand and respect the diverse needs of the people they work with.
- Pay close attention to diversity in all aspects of their work.
- Promote equality and diversity in their work.

- Take up training and development opportunities on a range of equality and diversity matters.
- Develop local knowledge within regions specific to particular ethnic and cultural groups.
- Address inappropriate behaviour within the working environment and report this to their manager.
- Actively challenge racism, discrimination, and inequality wherever observed, in line with Working Together 2026 expectations.
- Be fully aware of, and apply, policies and guidelines relating to equality.

Employees who knowingly discriminate, harass, or victimise another will be subject to the disciplinary procedure.

Managers are expected to adhere to the above and also:

- Provide guidance and promote development opportunities in equality and diversity matters.
- Provide information and training, particularly in respect of legislation and practice.
- Ensure practice promotes national standards and legislation.
- Promote best practice and ensure that service delivery is underpinned by this policy.
- Continuously promote equality, and monitor and evaluate performance.
- Address best practice constructively, and challenge oppressive practice.
- Deal effectively and appropriately with breaches of this policy.
- Ensure reasonable adjustments are made for disabled employees and for children in our care with a disability in line with the Equality Act 2010.

4.3 General

To help achieve our commitment to fairness and freedom from discrimination, Byram House monitors:

- Recruitment (applicants, shortlisting, appointments)
- Training and development programmes
- Grievance processes
- Complaints (from staff, children, families, and visitors)
- Disciplinary action
- Reasons given for leaving employment

4.4 Recruitment and Selection

- **Job advertisements** are written in language that is free from discrimination and with the aim of attracting a diverse range of applicants.
- Jobs will be advertised in appropriate media, including on our website, job centre websites, and other job boards.
- Applicants are shortlisted based on skills relevant to the specific functions of the job. Shortlisting decisions are based solely on the person specification and job description, not on protected characteristics.
- Date of birth is **not** provided to the interview panel, so that the selection process is protected from age discrimination.
- **All members of the interview panel will be trained in safer recruitment**, including awareness of unconscious bias and equality considerations.
- All safer recruitment and selection documentation is stored confidentially and in compliance with UK GDPR.

Equal Pay – We will ensure that all employees have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent, or work of equal value.

4.5 Training and Development

- This Equality and Diversity Policy is given to each employee upon commencement of employment.
- All employees are required to undertake Equality and Diversity training during their initial probation period. The training covers: protected characteristics, types of discrimination, recognising unconscious bias, reporting discrimination, and making reasonable adjustments.
- Equality and diversity forms a significant part of all ongoing training and development.
- The design and delivery of employee training is monitored to ensure the content is appropriate to each participant and free from discrimination.
- All staff receive annual refresher training on the new duty to prevent sexual harassment (following the Employment Rights Act 2025), including risk assessments, reporting pathways, and what constitutes “all reasonable steps” in the workplace.

4.6 Time off for Religious Days

- Employees who may require time off to observe a religious festival not covered by current statutory holidays may request the time off either as annual leave or unpaid leave.
- Employees who require religious observance during the course of their working day should discuss any reasonable requirements with their manager. The request will be reviewed by the manager, taking into account the service need to accommodate it.
- All employees, whatever their religion or belief, will be treated equally in respect of time off for religious days or requests in relation to religious observance.

4.7 Monitoring, Evaluation and Review

- We monitor policies, procedures, and working practices to ensure they promote equality and eliminate unlawful discrimination.
- All feedback — for example, feedback on training, feedback on the homes, complaints and compliments — is reviewed for ways in which we can improve equality both within service design and service delivery.
- This policy will be reviewed **annually**. Necessary revisions will be made to reflect changes in legislation, best practice, and inspection framework requirements.

4.8 Defining Discrimination

Diversity

Diversity aims to recognise, respect and value people's differences to contribute and realise their full potential by promoting an inclusive culture for all staff and those in our care. The concept of diversity encompasses acceptance and respect. It means understanding that each individual is unique and recognising our individual differences across dimensions including race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, and other ideologies.

Equality

Ensuring individuals or groups of individuals are treated fairly and equally, and no less favourably, specific to their needs, including in areas of race, gender, disability, religion or belief, sexual orientation, and age. Promoting equality should remove discrimination in all the above-mentioned areas. Bullying, harassment, and victimisation are also considered equality and diversity issues.

Anti-Discriminatory Practice

Treating families and individuals the same is not the same as treating them equally. To treat individuals equally, it is important to recognise that society does not provide a level playing field; a variety of factors may have to be taken into account.

Anti-discriminatory practice promotes:

- Diversity and the valuing of all difference.
- Self-esteem and positive group identity.
- Fulfilment of individual potential.

We aim not to make assumptions based on an individual's culture, religion, or background, but to get to know people on a personal and professional basis, avoiding pre-judgement and fixed expectations.

Direct Discrimination

Treating an individual less favourably than another person because of a protected characteristic they have, are thought to have, or because they associate with someone who has a protected characteristic.

Examples of direct discrimination include:

- Refusing to employ a disabled person because of their impairment.
- Racially or sexually derogatory emails or voicemails.
- Uninvited sexual innuendo and/or advances.
- Wording in adverts or promotional material that relates directly and inappropriately to age.

Discrimination by Perception

Direct discrimination based on the perception that the victim possesses a particular protected characteristic, even if they do not.

Example:

- George is subjected to homophobic abuse at work. George is not gay and has said so, but the abuse continues. This is discrimination by perception because of sexual orientation.

Discrimination by Association

Discriminating against an individual because they associate with another person who possesses a protected characteristic.

Example:

- A child is refused a place at a activity group because the group knows their younger sibling has a disability. This is discrimination by association.

Indirect Discrimination

Applying unjustifiable requirements or conditions which have a disproportionate impact on an individual or a particular group.

Example:

- Arranging events and appointments at times, dates, or in venues that certain groups are unable to attend, with no good reason other than to exclude that individual or group from opportunities.

Victimisation

Treating a person less favourably than others because they have acted as a witness or informant in proceedings, or because of their participation (or non-participation) in trade union activities.

Harassment

Unwanted conduct relating to a protected characteristic (excluding pregnancy, maternity, marriage, or civil partnership) which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. This may include third-party harassment and harassment based on perception and association. It includes unwelcome verbal, non-verbal, and physical conduct, which may be a single incident or a series of events.

Bullying

Persistent criticism, personal abuse and/or ridicule, ignoring, excluding, or other behaviour, either in public or private, which humiliates and demeans the individual involved, gradually eroding their self-confidence and the performance of their duties. It may involve the abuse of authority, unreasonable changes in an employee's responsibilities, or exclusion from normal social, consultative, and decision-making processes.

Taking appropriate action early can prevent a situation escalating into something more serious and damaging to all involved. Normally informal processes are the first to be followed, as individuals may be unaware of the damaging impact of their actions, and dialogue can best ensure greater awareness. Staff may wish to seek advice or help from a work colleague, Manager, or the Human Resources team.

5. How the Home Trains its Staff About this Policy

Byram House provides structured training to ensure all staff understand and can implement this Equality and Diversity Policy effectively.

Training Element	Frequency	Method / Content
Induction	Upon appointment	Face-to-face training covering: the Equality Act 2010 and protected characteristics, the definition of discrimination (direct, indirect, by perception, by association), harassment, victimisation, bullying, unconscious bias, reporting procedures, reasonable adjustments, and the dual-site operation (62 & 66 Deighton Road).
Annual refresher	Every 12 months	Classroom or virtual session covering updates to legislation (including the Employment Rights Act 2025 duty to prevent sexual harassment), changes to the SCCIF 2026, Working Together 2026 expectations on anti-discriminatory practice, and case studies on real-world equality issues.
Sexual harassment prevention training	Annually (from 2026)	Training on the new duty under the Employment Rights Act 2025 to take "all reasonable steps" to prevent sexual harassment, including risk assessment requirements, policies for reporting, and the anticipated regulatory steps (expected implementation October 2026).
Unconscious bias training	At induction and biennially thereafter	Training to help staff recognise and mitigate unconscious biases in recruitment, promotion, day-to-day interactions, and care delivery.

Reasonable adjustments awareness	At induction and as needed	Training on the duty to make reasonable adjustments for disabled employees and for children with disabilities in our care, including understanding when and how adjustments should be made.
Anti-racist and culturally informed practice	Annually	Training aligned with Working Together 2026 expectations, focusing on understanding and challenging racism and discrimination, and developing cultural competence in service delivery.
Record keeping and monitoring	At induction and refresh	Training on the home's equality monitoring systems, including how data on protected characteristics is collected, stored in compliance with UK GDPR, and used to identify and address disparities.

Staff are required to:

- Confirm in writing that they have read and understood this policy (annually).
- Attend all mandatory training sessions.
- Ask questions if any part of the policy or training is unclear.
- Report any gaps in their own knowledge or competence to their manager or the HR team.
- Actively challenge discrimination, harassment, or victimisation when observed, and report it appropriately.

6. Related Policies and Guidance

This policy must be read in conjunction with:

- Safeguarding Policy
- Whistleblowing Policy
- Complaints Policy
- Disciplinary and Grievance Policy
- Recruitment and Selection (Safer Recruitment) Policy
- Flexible Working Policy
- Data Protection Policy
- Children's Homes (England) Regulations 2015
- Working Together to Safeguard Children 2026
- Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026
- HR policies on maternity, paternity, adoption, and parental leave



Byram House

Policy Name	Safeguarding Policy	
Home	Byram House	
Reviewed by	Danyaal Iqbal / Mustafa Amin	Deputy Manager / Registered Manager
Approved by	Stacey Wagstaffe	Responsible Individual
Date	May 2026	